

### REMARKS

The examiner rejects claims 1-8, and 10-20 of the present application under 35 U.S.C. §102 based on Rinehart (6,359,331). Claims 1, 10, and 16 of the present application are independent claims. Rinehart discloses an embodiment utilizing two capacitors to filter out line inductance. ( $C_b$  and  $C_d$ ). Rinehart uses capacitor  $C_b$  to filter out stray inductance within the module (Col. 3 lines 44-50). Additionally Rinehart uses capacitor  $C_d$  as a “decoupling capacitor.” This decoupling capacitor is used to filter the stray inductance resulting from the terminals. (Col. 3 lines 50-60) Rinehart discloses design problems that require the use of two different capacitors ( $C_b$  and  $C_d$ ) to filter out line inductance. As shown above Rinehart utilizes both capacitors as filter capacitors and does not disclose both a high frequency capacitor and a bulk capacitor.

The present device explicitly claims a high frequency capacitor and a bulk capacitor in each of its independent claims. In contrast, Rinehart suggests that both of his capacitors are substantially the same and perform the same function. (col.3, line 45-46 and col. 3 line 66 to col. 4, line 1.) Thus, however the Examiner interprets the two capacitors of Rinehart, there is no justification for interpreting one to be a high frequency capacitor and one to be a bulk capacitor. Since Rinehart does not disclose a high frequency capacitor and a bulk capacitor, the independent claims 1, 10, and 16 are not anticipated by Rinehart.

The examiner rejected claim 9 based on a combination of Rinehart and Aker et al. (6,803,746). Since independent claim 1 is not anticipated by Rinehart, a combination of Rinehart and Aker will not result in the device of claim 9. Additionally Aker discloses utilizing a 750  $\mu$ F capacitor, and the examiner argues that this meets the requirement of both an approximately 500  $\mu$ F capacitor and an approximately 800  $\mu$ F capacitor from claim 9. Using identical capacitors for both applications in the current device would defeat claim 1 as it would remove the distinction between a “high frequency capacitor” and a “bulk capacitor.” Because of this, application of the Akers reference could not possibly result in the capacitor configuration of Claim 9.

New claims 21-23 further clarify the distinction between the high frequency capacitor and the bulk capacitor. As explained above, Rinehart does not disclose the high frequency

capacitor and the bulk capacitor.

If any fees or extensions of time are ever required, please charge to Deposit Account No. 50-1482 in the name of Carlson, Gaskey & Olds.

Respectfully Submitted,

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